

STATEMENT REGARDING OPERATING PROCEDURES

Sims Company ("Carrier") has established operating procedures that ensure compliance with the rules and regulations of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI), 47 C.F.R. Sections 64.2001-2009.

Carrier has a system in place in which the status of each customer's CPNI approval can be established prior to any use, disclosure or access.

Carrier trains its employees in the authorized use of CPNI. Carrier has established disciplinary procedures for any employee which does not adhere to Carrier's CPNI procedures.

Carrier retains a record of the sales and marketing campaigns of it and its affiliates which use the CPNI of customers and Carrier maintains a record of Carrier's compliance for at least the minimum of one year. Carrier's records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. CPNI notifications are provided to customers as required by the Commission's rules. Carrier maintains records of customer approval and notifications for the minimum period of one year.

Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for marketing situations. Sales personnel are required to obtain supervisory approval for any proposed marketing request.

Carrier maintains confidentiality agreements pursuant to the Commission's CPNI rules with any joint venture partner and independent contractor.